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Attorneys for Defendant Robert D. Keller

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROBERT DE VITO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIQUID HOLDINGS GROUP, INC.,
BRIAN M. STORMS, KENNETH D.
SHIFRIN, PETER R. KENT, RICHARD
SCHAEFFER, BRIAN FERDINAND,
JAY BERNSTEIN, DARREN DAVY,
DAVID FRANCESCANI, WALTER
RAQUET, THOMAS ROSS, VICTOR
SIMONE, JR., DENNIS SUSKIND,
ALLAN ZAVARRO, and SANDLER,
O'NEILL & PARTNERS, LP.,

Defendants.

Civil Action No. 2:15-cv-06969-KM-JBC

DECLARATION OF JOHN J. CLARKE, JR.
IN SUPPORT OF APPLICATION FOR
ADMISSION PRO HAC VICE

Pursuant to 28 U.S.C. § 1746, JOHN J. CLARKE, JR., of full age, declares:

1. I am a member of the Bar of the State of New York and of DLA Piper LLP (US), 1251 Avenue of the Americas, New York, New York 10020, attorneys for defendant Robert D. Keller in this action.

2. I am submitting this declaration in support of the application of Mr. Keller, pursuant to this Court's Local Civil Rule 101.1(c), for my admission *pro hac vice* in this action.

3. I am a member in good standing of the Bar of the State of New York. I was admitted to practice in New York on January 14, 1991 by the Appellate Division, First Judicial Department, of the Supreme Court of the State of New York. That court is located at 27 Madison Avenue, New York, New York 10010.

4. I also am admitted to practice before various federal courts, including the Supreme Court of the United States, the United States Courts of Appeals for the Second Circuit, the Third Circuit, the Fifth Circuit and the D.C. Circuit, and the United States District Courts for the Southern District of New York and for the Eastern District of New York.

5. I certify that no disciplinary proceedings are pending against me in any jurisdiction and that no discipline has previously been imposed on me in any jurisdiction.

6. I specialize in complex litigation involving claims under the federal securities laws, among other subject matters. I am familiar with the claims asserted in this action against Mr. Keller.

7. I am associated in this matter with Michael D. Hynes, a member of DLA Piper LLP (US), who has appeared in this action as Mr. Keller's attorney of record, is authorized to practice law in the State of New Jersey, and is a member in good standing of the Bar of this Court.

8. Upon being admitted to appear and participate in this matter *pro hac vice*, I shall promptly make payment to the New Jersey Lawyers' Fund for Client Protection as provided in New Jersey Court Rule 1:28-2(a), for any year in which I continue to appear in this matter.

9. Upon being admitted to appear and participate in this matter *pro hac vice*, I also shall promptly make payment to the Clerk of the United States District Court for the District of New Jersey as provided in Local Civil Rule 101.1(c)(3).

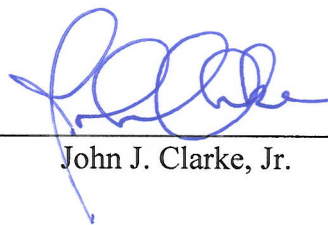
10. Pursuant to Local Civil Rule 101.1(c)(4), I understand that upon my admission *pro hac vice*, I am deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended.

11. I also understand that upon my admission *pro hac vice*, I shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court and the New Jersey State Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to notify the Court immediately of the institution of any disciplinary proceedings against me in any other jurisdiction.

12. I respectfully request that the Court grant Mr. Keller's application for my admission *pro hac vice* to appear and participate as his counsel in this action pursuant to Local Civil Rule 101.1(c).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

EXECUTED this 31st day of August, 2016, at New York, New York.



John J. Clarke, Jr.